

**REMARKS**

Reconsideration is respectfully requested.

**Rejections under 35 U.S.C. 102 and 103**

Claims 1-6, 10-14, 18-26, 30-34, 38-46, 50-54 and 58-60 were variously rejected under 35 U.S.C. 102 and 103 on the basis of Arango (6,724,747). Applicants respectfully traverse.

First, the claims have been amended to conform the present application to its EPO counterpart, European Application No. 01307287.1.

Arango is directed to a call agent system that exercises call management over two endpoints communicating over a packet-based network. Unlike the IP PAG of the present application, the call agent does not itself pass bearer traffic. This is clear from each of Figs. 1-5 of Arango and from column 4, lines 11-14, where it is stated:

After the call agent 160 sets-up a connection for the subscriber unit 130 over the network 150, information is exchanged between the subscriber units 110 and 130 over the network through their respective gateways 120 and 140. Thus, in a preferred embodiment, the call agent 160 is used for call management and the *information exchanged between the subscriber units 110 and 130 does not pass through the call agent 160.* [Emphasis added].

The present invention is thus distinguishable from Arango in that the claimed IP PAG passes bearer traffic between two IP endpoints. Moreover, there are two IP bearer connections associated with the IP PAG, whereas the gateways RGW and TGW in Arango only maintain one IP bearer connection for a given call. More particularly, each gateway in Arango acts as a conventional IP endpoint when communicating with another gateway. Moreover, the gateways are only IP compatible on one side thereof, the other side being adapted for conventional telephone traffic. The IP PAG of the present application maintains two IP bearer connections per call.

**REMARKS**

Reconsideration is respectfully requested.

**Rejections under 35 U.S.C. 102 and 103**

Claims 1-6, 10-14, 18-26, 30-34, 38-46, 50-54 and 58-60 were variously rejected under 35 U.S.C. 102 and 103 on the basis of Arango (6,724,747). Applicants respectfully traverse.

First, the claims have been amended to conform the present application to its EPO counterpart, European Application No. 01307287.1.

Arango is directed to a call agent system that exercises call management over two endpoints communicating over a packet-based network. Unlike the IP PAG of the present application, the call agent does not itself pass bearer traffic. This is clear from each of Figs. 1-5 of Arango and from column 4, lines 11-14, where it is stated:

After the call agent 160 sets-up a connection for the subscriber unit 130 over the network 150, information is exchanged between the subscriber units 110 and 130 over the network through their respective gateways 120 and 140. Thus, in a preferred embodiment, the call agent 160 is used for call management and the *information exchanged between the subscriber units 110 and 130 does not pass through the call agent 160.*" [Emphasis added].

The present invention is thus distinguishable from Arango in that the claimed IP PAG passes bearer traffic between two IP endpoints. Moreover, there are two IP bearer connections associated with the IP PAG, whereas the gateways RGW and TGW in Arango only maintain one IP bearer connection for a given call. More particularly, each gateway in Arango acts as a conventional IP endpoint when communicating with another gateway. Moreover, the gateways are only IP compatible on one side thereof, the other side being adapted for conventional telephone traffic. The IP PAG as claimed herein maintains two IP bearer connections per active IP bearer path.

Each of the dependent claims offer further grounds for distinguishing the claimed subject matter from Arango. Indeed, a review of each dependent claim reveals none whose added subject matter appears to be disclosed or suggested by Arango, as follows:

Claims 2, 22, 42 – Arango does not disclose a bearer connection table. The cited passages at column 3, lines 52-67 and column 4, lines 1-17 do not reference such subject matter.

Claims 3, 23, 43 – Arango does not disclose a key entry of a bearer connection table corresponding to an active IP bearer path and comprising first and second tuples. The cited passage at column 7, lines 31-51 does not reference such subject matter.

Claims 4, 24, 44 – Arango does not disclose the tuple formats recited in the claims. Arango's Fig. 12 and the cited passage at column 9, lines 34-60 does not reference such subject matter.

Claims 5, 25, 45 – Arango does not disclose the utilization of a bearer connection table in the manner recited in the claims. The cited passage at column 9, lines 34-60 does not reference such subject matter.

Claims 6, 26, 46 – Arango does not disclose or suggest any form of bearer traffic policing. The statement of obviousness based on personal knowledge is challenged under MPEP 2144.03, and a declaration is requested. Moreover, the statement that "a set-up connection call will determine if the traffic path is cleared or not busy prior to making its connection" is not understood. The traffic policing function of the claims is performed after connection setup and refers to policing packets.

Claims 10, 30, 50 – Arango does not disclose the relaying of signaling messages on a bearer connection. Signaling sent by a gateway in Arango goes to the call agent and not over the IP bearer path. The cited passage at column 9, lines 34-60 does state otherwise.

Claims 11, 31, 51 – Arango does not disclose the use of an IP endpoint table that lists IP addresses for IP endpoints that are authorized to send signaling messages. The cited passage at column 9, lines 34-60 does not reference such subject matter.

Claims 12, 32, 52 – Arango does not disclose the claimed handling of signaling messages. The cited passage at column 9, lines 34-60 does not reference such subject matter.

Claims 13, 33, 53 – Arango does not disclose the relaying of the recited signaling message types on a bearer connection to a call control entity. Signaling sent by a gateway in Arango goes to the call agent and not over the IP bearer path. Arango's Fig. 1 and the cited passages at column 3, lines 63-67 and column 4, lines 1-17 do not reference such subject matter.

Claims 14, 34, 54 – Arango does not disclose the relaying of the recited signaling message type on a bearer connection to an SNMP manager. Signaling sent by a gateway in Arango goes to the call agent and not over the IP bearer path. The cited passage at column 12, lines 22-33 does not reference such subject matter.

Claims 18, 38, 58 – Arango does not disclose terminating plural IP lines at a line-side IP PAG and terminating plural IP trunks at a trunk-side IP PAG. Indeed, there is only one call agent in Arango. Arango's Fig. 1 and the cited passage at column 4, lines 18-30 does not reference such subject matter.

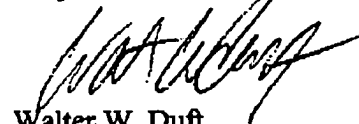
Claims 19, 39, 59 – Arango does not disclose a switching fabric between a line-side IP PAG and a trunk-side IP PAG. Arango's Fig. 1 and the cited passage at column 4, lines 18-30 does not reference such subject matter.

Claims 20, 40, 60 – Arango does not disclose connecting a line-side IP PAG or a trunk-side IP PAG to one or more resource servers. Arango's Fig. 1 and the cited passage at column 4, lines 18-39 does not reference such subject matter.

In view of the foregoing, Applicants respectfully request that all rejections be withdrawn and that Notices of Allowability and Allowance be issued.

Applicants direct attention to the **CHANGE OF CORRESPONDENCE ADDRESS** form enclosed herewith, and request that the undersigned representative's new address information be entered into the file wrapper.

Respectfully submitted,



Walter W. Duft  
Attorney for Applicants  
Registration No. 31,948

Law Offices of Walter W. Duft  
8616 Main Street, Suite 2  
Williamsville, New York 14221  
Telephone: (716) 633-1930  
Facsimile: (716) 633-1932